

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PARK BUILDING, LTD,

Plaintiff,

v.

BEAUTY EXPRESS SALONS INC.

Defendant.

Case No. 2:21-cv-00033-JFC

District Judge Joy Flowers Conti

BEAUTY EXPRESS SALONS INC.

Counter-Plaintiff,

v.

PARK BUILDING, LTD,

Counter-Defendant.

BEAUTY EXPRESS SALON INC.'S MOTION TO COMPEL

Defendant/Counter-Plaintiff Beauty Express Salons Inc. (“Beauty Express”), by and through its undersigned counsel and pursuant to Federal Rules of Civil Procedure 37(a) and 36(a)(6), hereby files the following Motion to Compel against Plaintiff/Counter-Defendant Park Building, Ltd. (“Park Building”), stating as follows:

(1) For the reasons set forth in the Memorandum of Law in Support of Beauty Express Salon Inc.’s Motion to Compel, which is being filed contemporaneously herewith and is incorporated herein by reference, the Court should grant this Motion to Compel and enter an order in the form of the proposed order that is attached hereto.

Date: January 14, 2022

Respectfully submitted,

/s/ John A. Marty

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Express Salons Inc.*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Western District of Pennsylvania by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ John A. Marty
John A. Marty